

# Client Alert

## International Trade

16 February 2015

## EU adds more separatists and five Russian officials to Ukraine-related asset freeze list

The EU has today extended its sanctions in relation to Ukraine by adding **19 persons and nine entities** to the asset freeze list. These newly designated parties are deemed to be actively involved in separatist activities in Eastern Ukraine or supporting such activities from Russia.

The expanded EU asset freeze was unanimously adopted by the Foreign Affairs Council last Monday (9 February 2015), but the entry into force of the sanctions was then put on hold to allow continued diplomatic efforts to reach a ceasefire agreement for Eastern Ukraine.<sup>1</sup> Despite the new Minsk ceasefire accord established last week, the EU has now enacted the expanded asset freeze “in view of the continued gravity of the situation on the ground in Ukraine”.

On 16 February 2015, **Regulation 2015/240**<sup>2</sup> was published by the EU to add another **14 Ukrainian separatists and 5 Russian officials** to the list of parties subject to an asset freeze and visa ban. **Nine separatist groups** have also been added to the asset freeze list.<sup>3</sup>

Under the asset freeze, all funds and economic resources belonging to or controlled by the listed parties that fall under EU jurisdiction (e.g. are held by EU banks) will be frozen. Furthermore, no funds or economic resources (in the broad sense) may be made available – directly or indirectly – to or for the benefit of the listed persons by parties falling under EU jurisdiction.<sup>4</sup>

The newly-added designated parties (and the reasoning given for them being sanctioned) effective **16 February 2015** are:

### Individuals

1. Pavel DREMOV aka Batya (Павел ДРЁМОВ) (*Commander of the armed separatist group ‘First Cossack Regiment’, fighting in Eastern Ukraine*)
2. Alexey MILCHAKOV aka Fritz, Serbian (Алексей МИЛЬЧАКОВ) (*Commander of the armed separatist group ‘Rusich’ unit, fighting in Eastern Ukraine*)
3. Arseny PAVLOV aka Motorola (Арсений Сергеевич ПАВЛОВ (aka Моторо́ла)) (*Commander of the armed separatist group ‘Sparta Battalion’, fighting in Eastern Ukraine*)
4. Mikhail TOLSTYKH aka Givi (Михаил Толстых) (*Commander of the armed separatist group ‘Somali’ battalion, fighting in Eastern Ukraine*)

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<sup>1</sup> See <http://www.consilium.europa.eu/en/meetings/fac/2015/02/09/>.

<sup>2</sup> See [Council Implementing Regulation \(EU\) No 2015/240](#) of 9 February 2015. See also [Council Decision \(CFSP\) 2015/241](#).

<sup>3</sup> The total number of parties listed under original Regulation 269/2014 imposing EU sanctions in respect of actions considered to undermine or threaten the territorial integrity, sovereignty and independence of Ukraine now stands at **151 persons and 37 entities** (see our alert from 1 December 2014 on the previous expansion of this list [here](#)).

<sup>4</sup> The geographic scope of the asset freeze remains the same as before, applying in the following situations: within EU territory; to nationals of EU Member States (regardless of whether they are inside or outside EU territory); on board vessels and aircraft under Member State jurisdiction; to companies incorporated or registered under Member State law and to other companies in respect of business done in whole or in part in the EU.

5. Eduard BASURIN (Эдуард Басурин) (*'Deputy Commander' of the Ministry of Defense of the 'Donetsk People's Republic'*)
6. Alexandr SHUBIN (Александр Васильевич ШУБИН) (*'Minister of Justice' of the 'Luhansk People's Republic'*)
7. Sergey LITVIN (Сергей Анатольевич ЛИТВИН) (*Deputy Chairman of the Council of Ministers of the 'Luhansk People's Republic'*)
8. Sergey IGNATOV (Сергей Юрьевич ИГНАТОВ) (*Commander in Chief of the People's Militia of the 'Luhansk People's Republic'*)
9. Ekaterina FILIPPOVA (Екатерина Владимировна ФИЛИППОВА) (*'Minister of Justice' of the 'Donetsk People's Republic'*)
10. Aleksandr TIMOFEEV (Александр ТИМОФЕЕВ) (*'Minister of Budget' of the 'Donetsk People's Republic'*)
11. Evgeny MANUILOV (Евгений Владимирович МАНУЙЛОВ) (*'Minister of Budget' of the 'Luhansk People's Republic'*)
12. Viktor YATSENKO (Виктор ЯЦЕНКО) (*'Minister of Communications' of the 'Donetsk People's Republic'*)
13. Olga BESEDINA (Ольга Игоревна БЕСЕДИНА) (*'Minister of Economic Development and Trade' of the 'Luhansk People's Republic'*)
14. Zaur ISMAILOV (Заур Исмаилов) (*'Acting General Prosecutor' of the 'Luhansk People's Republic'*)
15. Anatoly Ivanovich ANTONOV (Анатолий Иванович Антонов) (*Russian Deputy Minister of Defence, supporting the deployment of Russian troops in Ukraine*)
16. Arkady Viktorovich BAKHIN (Аркадий Викторович Бахин) (*Russian First Deputy Minister of Defence, supporting the deployment of Russian troops in Ukraine*)
17. Andrei Valeryevich KARTAPOLOV (Андрей Валерьевич Картаполов) (*Director of the Main Operations Department and deputy chief of the General Staff of the Armed Forces of the Russian Federation, involved in shaping and implementing the military campaign of the Russian forces in Ukraine*)
18. Iosif (Joseph) Davydovich KOBZON (Иосиф Давыдович Кобзон) (*Member of the Russian State Duma; appointed Russian Honorary Consul of the 'Donetsk People's Republic' and has made statements supporting separatists*)
19. Valery Fedorovich RASHKIN (Валерий Фёдорович Рашкин) (*First Deputy Chairman of the Russian State Duma Committee on Ethnicity issues; founder of the civil movement 'Krassnaya Moskva - Red Moscow - Patriotic Front Aid' which has organised public demonstrations supporting separatists*)

#### Entities

1. Cossack National Guard (Казачья Национальная Гвардия) (*Armed separatist group, commanded by listed person Nikolay KOZITSYN*)
2. Sparta battalion (Батальон 'Спарта') (*Armed separatist group, commanded by listed person Arseny PAVLOV*)
3. Somali battalion (Батальон 'Сомали') (*Armed separatist group, commanded by listed person Mikhail TOLSTYKH aka Givi*)
4. Zarya battalion (Батальон 'Заря') (*Armed separatist group*)
5. Prizrak brigade (Бригада 'Призрак') (*Armed separatist group, commanded*

*by listed person Oleksiy MOZGOVY)*

6. Oplot battalion (Батальон 'Оплот') *(Armed separatist group)*
  7. Kalmius battalion (Батальон 'Кальмиус') *(Armed separatist group)*
  8. Death battalion (Батальон 'Смерть') *(Armed separatist group)*
  9. Public Movement 'NOVOROSSIYA' (Движение Новороссия)  
*(Established in November 2014 in Russia and headed by Russian GRU staff member Igor Strelkov aiming at providing all-round, effective assistance to 'Novorossiya', including by helping militia fighting in Eastern Ukraine)*
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